

**Wittels
McInturff
Palikovic**

November 12, 2024

Via ECF

The Hon. Andrew E. Krause
United States District Court
300 Quarropas St.
White Plains, NY 10601

Re: *Cap 111 Enters. LLC v. Manhattan Beer Distrib., LLC*, No. 22 Civ. 1408 (CS) (AEK)

Dear Judge Krause,

The parties write jointly pursuant to Local Civil Rule 7.1(d) and Your Honor's Individual Practice I.D. to request that the Court extend the stay in this action for an additional 21 days, to Thursday, December 5, 2024. The stay is currently set to expire on Thursday, November 14.

The reason for this request is that the parties executed the final Class Action Settlement Agreement on November 11. Plaintiffs are working on the unopposed preliminary approval submission to Judge Seibel, but the parties require a modest extension to ensure all issues are adequately addressed prior to filing and to accommodate the upcoming holiday. The parties do not anticipate needing additional extensions of the stay.

In accordance with Your Honor's Individual Rule I.D, the current expiration of the stay is November 14. Your Honor previously granted one extension of the stay the Court entered on August 19, 2024. ECF No. 185. This is the parties' second request to extend the stay the Court entered on August 19. All parties consent to the requested extension.

Thank you for the Court's consideration of this request.

Respectfully Submitted,

/s/ Ethan D. Roman
Ethan D. Roman

*Counsel for Plaintiffs and the
Proposed Class*

cc: All Counsel of Record (*via ECF*)